

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION

Case No. 2:22-md-03042-JRG

THIS DOCUMENT RELATES TO CASE
NO. 2:23-cv-00113-JRG

JURY TRIAL DEMANDED

TAASERA LICENSING LLC,

Case No. 2:23-cv-00415-JRG

Plaintiff,

JURY TRIAL DEMANDED

V.

FORTINET INC.

Defendant.

JOINT MOTION TO EXTEND THE STAY OF ALL DEADLINES

Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Fortinet, Inc. (“Defendant” or “Fortinet”) (collectively, the “Parties”) file this Joint Motion to Extend the Stay of All Deadlines in the above-captioned case.

All matters in controversy between the Parties have been settled in principle and, on December 14, 2023, the Parties jointly moved to stay all deadlines and provided notice of settlement (Dkt. 340). On the same day, this Court stayed the case until January 19, 2024 (Dkt. 343).

The Parties respectfully and jointly request that the Court extend the stay of all case deadlines between Taasera and Fortinet for an additional thirty (30) days to allow the Parties to finalize the settlement documents.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order

submitted with this motion as set forth above.

Dated: January 16, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

Joseph M. Mercadante

NY Bar No. 4784930

Email: jmercadante@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

Justin Kurt Truelove

State Bar No. 24013653

Email: kurt@truelovelawfirm.com

TRUELOVE LAW FIRM, PLLC

100 West Houston Street

Marshall, Texas 75670

Telephone: (903) 938-8321

Facsimile: (903) 215-8510

Samuel F. Baxter

State Bar No. 01938000

sbaxter@mckoolsmith.com

Jennifer L. Truelove

State Bar No. 24012906

Email: jtruelove@mckoolsmith.com

MCKOOL SMITH, P.C.

104 E. Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Facsimile: (903) 923-9099

ATTORNEYS FOR PLAINTIFF

TAASERA LICENSING LLC

/s/ Melissa R. Smith (with Permission)

Melissa R. Smith

State Bar No. 07921800

Email: melissa@gillamsmithlaw.com

GILLAM & SMITH, LLP

303 S. Washington Avenue

Marshall, Texas 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Alice Snedeker

DUANE MORRIS LLP

1075 Peachtree St NE, Suite 1700

Atlanta, Georgia 30309

Telephone: (404) 253-6989

Holly Engelmann

State Bar No. 24040865

Email: HEngelmann@duanemorris.com

DUANE MORRIS LLP

100 Crescent Court, Suite 1200

Dallas, Texas 75201

Telephone: (214) 257-7200

Fax: (214) 257-7201

ATTORNEYS FOR FORTINET INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on January 16,2024 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant